



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JN/DKK/LB/CJN
F. #2017R05903

*271 Cadman Plaza East
Brooklyn, New York 11201*

August 3, 2020

By Email and ECF

Thomas C. Green
Mark D. Hopson
Michael Levy
Joan M. Loughnane
Sidley Austin LLP

David Bitkower
Matthew S. Hellman
Jenner & Block LLP

Re: United States v. Huawei Technologies Co., Ltd., et al.
Criminal Docket No. 18-457 (S-3) (AMD)

Dear Counsel:

Enclosed please find the government's production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure. This discovery supplements the government's previous productions. The discovery is being produced pursuant to the Protective Order entered by the Court on June 10, 2019. See ECF Docket Entry No. 57. The government also requests reciprocal discovery from the defendants.

I. The Government's Discovery

Document Description	Category of Discovery Pursuant to Protective Order	Bates Range
Documents related to business in Iran ¹	Discovery Material ("DM")	DOJ_HUAWEI_B_0000006148- DOJ_HUAWEI_B_0000006494
Statements attributable to the defendants	DM	DOJ_HUAWEI_B_0000007082- DOJ_HUAWEI_B_0000007092
Report related to electronic device ²	DM	DOJ_HUAWEI_B_0000007093- DOJ_HUAWEI_B_0000007096

Very truly yours,

SETH D. DuCHARME
Acting United States Attorney

By: /s/ Julia Nestor
Alexander A. Solomon
Julia Nestor
David K. Kessler
Sarah Evans
Assistant United States Attorneys
(718) 254-7000

¹ These documents were previously produced under the same bates numbers as "Sensitive Discovery Material."

² This report is associated with the materials previously produced and bates-numbered DOJ_HUAWEI_B_0000000007.

DEBORAH L. CONNOR
Chief, Money Laundering and Asset
Recovery Section, Criminal Division
U.S. Department of Justice

By: /s/ Christian J. Nauvel
Laura Billings
Christian J. Nauvel
Trial Attorneys

JAY I. BRATT
Chief, Counterintelligence and Export
Control Section
National Security Division, U.S. Department
of Justice

By: /s/ Thea D. R. Kendler
Thea D. R. Kendler
David Lim
Trial Attorneys

cc: Clerk of the Court (AMD) (by ECF) (without Enclosures)